Exhibit C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANWAR ALKHATIB,
Plaintiff,

-against-

Case No. 13-CV-2337 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC, et al.,
Defendants.

SHAHADAT TUHIN
Plaintiff,

-against-

Case No. 13-CV-5643 (ARR) (SMG)

NEW YORK MOTOR GROUP, et al.
Defendants.

SIMON GABRYS,
Plaintiff,

-against-

Case No. 13-CV-7290 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC, et al.,
Defendants.

BORIS FREIRE, et al,
Plaintiffs,

-against-

Case No. 13-CV-7291 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC, et al.,
Defendants.

ZHENG HUI DONG,
Plaintiff,

-against-

Case No. 14-CV-2980 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC, et al.,
Defendants.

NASRIN CHOWDHURY,
Plaintiff,

-against-

Case No. 14-CV-2981 (ARR) (SMG)

NEW YORK MOTOR GROUP LLC, et al.,
Defendants.

TAREQUE AHMED
Plaintiff,

-against- **Case No. 15-CV-0284 (ARR) (SMG)**

NEW YORK MOTOR GROUP LLC, et al.,
Defendants.

YSABEL BANON,
Plaintiff,

-against- **Case No. 15-CV-4691 (ARR) (SMG)**

MANUFACTURERS AND TRADERS TRUST COMPANY, et al.,
Defendants.

CHEA SUNG PARK,
Plaintiff,

-against- **Case No. 15-CV-5374 (ARR) (SMG)**

SANTANDER CONSUMER USA, INC., et al.,
Defendants.

JOINT PRETRIAL STIPULATIONS

WHEREAS the parties wish to expedite the trial in the above-captioned cases, avoid unnecessarily burdening the Court, and economize to the greatest extent possible time spent before the Court and jurors,

It is hereby stipulated and agreed by and between counsel for plaintiffs Anwar Alkhatib, Shahadat Tuhin, Simon Gabrys, Boris Freire, Zheng Hui Dong, Nasrin Chowdhury, Tareque Ahmed, Ysabel Banon, and Chea Sung Park (collectively, "Plaintiffs"), and counsel for defendants Mamdoh Eltouby, Nada Eltouby, New York Motor Group LLC, and Planet Motor Cars, Inc. (collectively, "Defendants"), as follows:

1. Interstate Commerce

a. The parties stipulate and agree that:

i. Santander Consumer USA, Inc. is headquartered in Texas.

ii. Capital One Financial Corporation is headquartered in Virginia.

b. The contents of paragraph 1.a above may be read to the jury.

2. Admissibility of Plaintiff's Exhibits

a. Defendants will not make any objections – except on the basis of relevance – to any exhibits offered by Plaintiffs. For the avoidance of doubt, Defendants forego and waive any and all evidentiary objections to exhibits on the basis of hearsay, authenticity, prejudice, or on any grounds other than relevance.

b. For the avoidance of doubt, Defendants maintain their ability to object on the basis of hearsay to any live trial testimony from live witnesses.

Dated: New York, NY
February 27, 2017

/s/ Patricia Kakalec

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